

GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Suite 400
 Las Vegas, Nevada 89169
 Phone: (702) 978-4249/ Fax: (945) 333-4256

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
 Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
 Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
 GREENSPOON MARDER LLP
 200 East Broward Blvd., Ste. 1800
 Fort Lauderdale, FL 33301
 Tel: 954 491-1120
 Facsimile: 954-343-6958
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
 Nevada Bar No. 11276
 GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Ste. 400
 Las Vegas, NV 89169
 Tel: 702-978-4249
 Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton 675
 Nevada Bar No. 5065
 Gregory Kraemer
 COOPER LEVENSON, P.A.
 3016 W. Charleston Blvd., #195
 Las Vegas, NV 89102
 T: (702) 366-1125
 F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON REED,
 an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual and
 citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE REPLY
 IN SUPPORT OF MOTION TO
 COMPEL [ECF #284]**

[Second Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Reed Hein & Associates d/b/a/ Timeshare Exit Team (“Defendant”) hereby stipulate to extend Plaintiff’s deadline to file a Reply in support of Plaintiff’s Motion to Compel [ECF #284] (the “Motion”), currently set for October 2, 2020, until October 9, 2020, and as grounds state as follows:

1. Plaintiff filed the Motion on August 19, 2020.
2. Defendant filed its Opposition on September 11, 2020, after a brief extension to its response deadline.
3. Plaintiff recently completed drafting its Reply in Support of its Motion to Overrule SGB’s Privilege Claims, which is a fundamental issue in this litigation. Plaintiff is also in the process of drafting its opposition to SGB’s Motion for Leave to file supplemental evidence in support of its Opposition related to the privilege motion.
4. In addition to working on related briefing, Defendant’s Opposition raised several points related to documents that have been produced, but were not been specifically identified by bates reference. Counsel for Defendant recently provided bates references Defendant indicates are related to the referenced productions, and Plaintiff is evaluating these assertions.
5. In order to adequately respond to Defendant’s Opposition, and the issues presented therein, the Parties agree that Plaintiff’s deadline to file its Reply in support of the Motion be extended an additional week, up to and including October 9, 2020.
6. The hearing on this matter is scheduled on October 26, 2020. Accordingly this

1 extension will not impact the current hearing.

2 7. This is the Parties' second request for extension of this deadline, and it is not
3 intended to cause any delay or prejudice to any party. Defendant does not object to the requested
4 extension.

5 Dated this 30th day of September, 2020

6 **GREENSPOON MARDER, LLP**

**GORDON REES SCULLY
MANSUKHANI, LLP**

8 /s/ Phillip A. Silvestri

/s/ Dione C. Wrenn

9 PHILLIP A. SILVESTRI, ESQ.

ROBERT S. LARSEN, ESQ.

10 Nevada Bar No. 11276

Nevada Bar No. 7785

11 3993 Howard Hughes Parkway, Suite 400

DAVID T. GLUTH, II, ESQ.

12 Las Vegas, NV 89169

Nevada Bar No. 10596

13 *Attorneys for Plaintiff*

DIONE C. WRENN, ESQ.

14 *Diamond Resorts Corporation*

Nevada Bar No. 13285

300 South 4th Street, Suite 1550

Las Vegas, Nevada 89101

Attorneys for Defendants

*Reed Hein & Associates, LLC dba Timeshare
Exit Team, Brandon Reed, Trevor Hein,
Thomas Parenteau, and Happy Hour Media
Group, LLC*

19 IT IS SO ORDERED

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 9-30-2020

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 17th day of September 2020. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri

An employee of Greenspoon Marder LLP

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